

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

PAULA SMOOT,
Plaintiff,

v.

Civil Action No. 04-10105-GAO

MARRIOTT INTERNATIONAL, INC.
d/b/a/ MARRIOTT HOTELS, RESORTS
and SUITES
Defendant.

JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1(D)

The parties, pursuant to Fed. R. Civ. P. 16(b) and Local Rule 16.1, hereby file the following joint statement and proposed pre-trial schedule in anticipation of the Scheduling Conference scheduled for September 22, 2004.

Proposed Pre-Trial Schedule

A. Discovery Plan

1. Interrogatories

Up to two sets of interrogatories served by each party with each party limited to a total of twenty-five interrogatories. Service of initial set by October 12, 2004 and response in accordance with Rule 33.

2. Requests for Production of Documents

Up to two sets of requests for production of documents for each party, each party limited to a total of twenty-five requests. Service

of initial set by October 12, 2004 and responses in accordance with Rule 34.

3. Depositions

Up to six depositions for each party. All depositions completed by June 24, 2005.

4. Expert Disclosure

Plaintiff to disclose all experts and reports as required by Fed. R. Civ. P 26 by November 30, 2004. Defendant to make counter-designation by December 31, 2004.

B. Motion Schedule

1. All motions for summary judgment filed by August 8, 2005.

2. All oppositions filed by September 1, 2005.

C. Proposed Pre-Trial Conference Date

The parties propose that the Court conduct a pre-trial conference on September 29, 2005 or as soon thereafter as the Court's calendar permits.

D. Certifications

The parties will file Certifications in accordance with Local Rule 16.1 at the Scheduling Conference on September 22, 2004.

E. Alternative Dispute Resolution

The parties are amenable to mediation.


F. Referral To U.S. Magistrate Judge

The parties do not agree to refer this action to a U.S. Magistrate Judge for trial.

Respectfully submitted,

MARRIOTT HOTEL SERVICES, INC.,
a subsidiary of Marriott International, Inc.

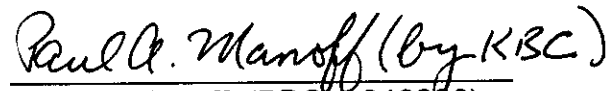
By its attorney,


Kevin B. Callanan (BBO # 070620)
Law Office of Kevin B. Callanan
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Norwell, MA 02061
781-878-1604

Respectfully submitted,

PAULA SMOOT

By her attorney,


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Boston, Massachusetts 02108
617-542-4620

Date: September 17, 2004